

**From:** Glaberson, Evan (USANYW)  
**To:** Kristen Flick; Eric Soehnlein  
**Subject:** RE: Next steps re Luis Martinez protective order  
**Date:** Tuesday, July 2, 2024 1:52:51 PM  
**Attachments:** [image001.png](#)

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**CAUTION - EXTERNAL:**

Kristen,

After a thorough review of the entire record, including the July 18, 2023 letter from Mr. Soehnlein, and it is the government's position that no further action or inquiry regarding the dissemination of protected materials in U.S. v. Martinez, 21-cr-89, is necessary at this time. The government believes the correspondence should be docketed publicly and that the submissions should not be under seal, save for any personal identifying information of third parties in order to protect the identity of the support staff at Mr. Soehnlein's prior firm. The government discussed this proposal with Mr. Soehnlein, who is cc'd here, and he agrees with this proposal, and is cc'd on this email as well.

The parties have no objection to these materials being docketed as the Court sees fit under their own case number or identifier. If the Court requires a more formal letter or motion addressing these issues, I am happy to provide whatever is necessary.

Thank you in advance, and I apologize for the delayed response,

**Evan K. Glaberson, Assistant United States Attorney**  
**Narcotics & Organized Crime Section**  
U.S. Attorney's Office/WDNY  
138 Delaware Avenue  
Buffalo, New York 14202  
(office) 716.843.5871 | (cell) 716.462.1738 | (fax) 716.551.3196  
Email: [Evan.Glaberson @usdoj.gov](mailto:Evan.Glaberson@usdoj.gov)

**From:** Kristen Flick [REDACTED]  
**Sent:** Tuesday, July 2, 2024 1:03 PM  
**To:** Eric Soehnlein <[eric@soehnleinlaw.com](mailto:eric@soehnleinlaw.com)>  
**Cc:** Glaberson, Evan (USANYW) <[EGLaberson@usa.doj.gov](mailto:EGLaberson@usa.doj.gov)>  
**Subject:** [EXTERNAL] RE: Next steps re Luis Martinez protective order

Hello again. I know that the last time I checked in, you were working internally and with each other on this. But we wanted to check in to see if there is any update.

Thank you. And have a nice long weekend.



**Kristen E. Flick**

*Law Clerk to Hon. John L. Sinatra, Jr.  
Western District of New York  
Robert H. Jackson United States Courthouse  
2 Niagara Square, Buffalo, NY 14202  
Direct: [REDACTED] Chambers: 716-551-1640*

**From:** Eric Soehnlein <eric@soehnleinlaw.com>  
**Sent:** Wednesday, June 12, 2024 5:09 PM  
**To:** Kristen Flick [REDACTED]  
**Cc:** Glaberson, Evan (USANYW) <Evan.Glaberson@usdoj.gov>  
**Subject:** Re: Next steps re Luis Martinez protective order

**CAUTION - EXTERNAL:**

Thank you both.

Evan, I am tied up tomorrow but generally free on Friday if you want to discuss. Thank you.

Sent from my iPhone

On Jun 12, 2024, at 5:05 PM, Kristen Flick [REDACTED] > wrote:

Thank you for the update.

<image001.png>

**Kristen E. Flick**

*Law Clerk to Hon. John L. Sinatra, Jr.  
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**From:** Glaberson, Evan (USANYW) <[Evan.Glaberson@usdoj.gov](mailto:Evan.Glaberson@usdoj.gov)>  
**Sent:** Wednesday, June 12, 2024 5:04 PM  
**To:** Kristen Flick [REDACTED] | Eric Soehnlein  
<[eric@soehnleinlaw.com](mailto:eric@soehnleinlaw.com)>  
**Subject:** RE: Next steps re Luis Martinez protective order

**CAUTION - EXTERNAL:**

Thanks for the email. Eric has been waiting for me to resolve our position internally before discussing it with him. I intend to discuss with him this week and we will submit something, possibly jointly, to the Court next week.

**Evan K. Glaberson, Assistant United States Attorney  
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Email: Evan.Glaberson@usdoj.gov

**From:** Kristen Flick [REDACTED]  
**Sent:** Wednesday, June 12, 2024 4:52 PM  
**To:** Glaberson, Evan (USANYW) <[EGLaberson@usa.doj.gov](mailto:EGLaberson@usa.doj.gov)>; Eric Soehnlein <[eric@soehnleinlaw.com](mailto:eric@soehnleinlaw.com)>  
**Subject:** [EXTERNAL] Next steps re Luis Martinez protective order

Eric and Evan,

Judge Sinatra mentioned that he spoke with both of you several weeks ago about next steps regarding the Luis Martinez protective order issue. I attached our prior email conversations, and the letters attached to those emails, on this topic here as PDFs for your reference and context.

Have you had a chance to discuss what the next steps ought to be?

Thank you,  
Kristen

<image001.png> **Kristen E. Flick**  
*Law Clerk to Hon. John L. Sinatra, Jr.  
Western District of New York*  
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